My name is Ernest Lehmann. I am a citizen of Alexandria and I live ½ mile from the Mirant Plant.

I concur with the City of Alexandria's comments regarding the two-stack merger completely. Thank goodness we have a government agency that takes a responsible position regarding the air quality in Northern Virginia. Specifically I say that

1. **The Merged-Stack SOP is Deficient Because of Unresolved Issues such as**

- New Source Review (NSR), low-NOx burner (LNB), separated overfire air (SOFA), and trona injection all remains unresolved. Virginia DEQ must publicly disclose the outcome of its NSR applicability analysis. Credit for a prohibited dispersion technique, i.e., stack merger, remain unresolved.

2. **The Merged-Stack SOP is Not Comprehensive;** it contains no emission limits for $PM_{2.5}$. Likewise, an emissions limit for mercury is not included.

3. **$PM_{2.5}$ Emissions and Impacts Must be Addressed**

- $PM_{2.5}$ modeling must be applied to establish proper emission limits.Modeling of direct $PM_{2.5}$ emissions can be accomplished via standard modeling, as other states are doing. Given that Northern Virginia is a nonattainment area for $PM_{2.5}$, Virginia DEQ's approach to date of using PM_{10} as a surrogate for $PM_{2.5}$ is flawed and short-sighted.

4. **Baghouses are Required to Provide Adequate $PM_{2.5}$ Control**

- Alexandria's analysis shows that $PM_{2.5}$ emissions from PRGS must be significantly lower than 0.01 lb/MMBtu to show NAAQS compliance.

5. **The Limits are Arbitrary, Excessively High, and Allow Emissions Increases**

- The proposed coal sulfur content limit per shipment is 1.2% compared to 0.9% in the present permit, i.e., a 33% increase.
- The short term (lb/hr) SO_2 emission limits in the proposed SOP are greater than the limits in the June 1, 2007 SOP.
- The annual PM and PM_{10} limits of 562 and 377 tons/yr, respectively, are about three times as high as the plant emitted in the past. This is a virtual license for the plant to increase emissions.
- The annual NOx limits are much greater than the plant emitted in 2006, and also much greater than those allowed under the CAIR rule which will take effect in 2009, i.e., less than one year after the issuance of this SOP. The CAIR limits must be stipulated in the SOP.
- Mirant has known for several years that its CO emissions are greater than the approximately 250 ton/yr that it has reported in its past annual emissions statements.
- The opacity limit of 20% is based on antiquated standards and is not protective of public health. Instead, a limit of no more than 10% opacity must be required.

6. **CEMS for CO and PM Must be Required Immediately**

Mirant should be required to install PM CEMS as soon as possible. Mirant should also be required to install CO CEMS immediately. Proper quantification and documentation of CO emissions via CEMS measurements must be required immediately.

7. Pollution Controls Must be Optimized under All Operating Scenarios

- The plant is required by regulation to optimize all pollution controls to minimize emissions at all times of operation.
- Emission limits must reflect true performance of the pollution control devices.

8. Use of an Alternate Sorbent for SO_2 Control Must Not be Pre-Authorized

- The Board and VDEQ must require Mirant to perform a robust evaluation of any alternate sorbent prior to authorizing its use on a continuous basis, including particle size distribution and complete stack tests for concurrent pre- and post-ESP emissions, both with and without the use of sorbent. The applicability of NSR must be determined, and appropriate review performed, prior to allowing the use of this sorbent.

9. The SOP Must be Practically Enforceable

- Heat input rates must be enforceable. Coal firing rates and trona feed rates (tons/hr) must be recorded for each boiler.
- Stack tests for PM_{10} and $PM_{2.5}$ must be required every six months for the first two years. Upon demonstration of continuous compliance, the proposed staggered schedule for boiler stack tests may be followed. All plant data, including monitoring and testing records, must be made available to the public in a readily-accessible manner without the need for a FOIA request.

10. VDEQ Must Address $PM_{2.5}$ Emissions from Mirant PRGS as Part of the SIP Development

- PRGS is the single largest source of primary and secondary $PM_{2.5}$ emissions located within the nonattainment area of Northern Virginia. In addition, Alexandria is an "unmonitored area" because there is not a continuous ambient $PM_{2.5}$ monitor in the City. The City's dispersion modeling to date, including downwash, overwhelmingly demonstrates that a "hot spot" exists in the area surrounding the facility and that the PRGS contributes significantly to the nonattainment in Alexandria and Metropolitan Washington. It is therefore essential that the Virginia SIP has a mechanism requiring this facility to carry out a $PM_{2.5}$ analysis in order to ensure the region is in attainment for $PM_{2.5}$**.**
- A Reasonable Available Control Measures (RACM) analysis should be carried out on all major sources of $PM_{2.5}$.
- Virginia opacity limit should be reduced to 10% from the present limit of 20%. Both Maryland and Washington DC have opacity limit at 10%. This would significantly reduce $PM_{2.5}$ emissions from point sources.

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